

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re SADIA, S.A.
SECURITIES LITIGATION

Case No. 1:08-CV-09528 (SAS)

**NOTICE OF CLASS COUNSELS' MOTION
FOR AN AWARD OF ATTORNEYS' FEES
AND EXPENSES AND AN AWARD OF COSTS
AND EXPENSES TO THE CLASS REPRESENTATIVES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Proposed Settlement dated September 23, 2011, and upon the Joint Declaration of Christopher L. Nelson and Joseph E. White, III in Support of Final Approval of Settlement and Plan of Allocation, as well as an Application for an Award of Attorneys' Fees and Expenses and Reimbursement to the Class Representatives, and all other papers and proceedings herein, Class Counsel will and do hereby move this Court on December 22, 2011, at 2:30 p.m. in the Courtroom of the Honorable Shira A. Scheindlin, United States District Judge for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York 10007, or other such location and time as set by the Court, for entry of an Order awarding attorneys' fees and reimbursement of expenses to Class Counsel and an award of costs and expenses to the Class Representatives.

Dated: November 17, 2011

Respectfully submitted,

LAW OFFICES OF CURTIS V. TRINKO, LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the November 17, 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

/s/ Curtis V. Trinko
Curtis V. Trinko